

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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GABRIELLE DREXLER	:	
	:	
vs.	:	NO. 11-004467
	:	
TOWNSHIP OF LOWER MERION, et al.	:	

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ORDER

AND NOW this       day of       , 2011 it is hereby ORDERED that Plaintiff, **GABRIELLE DREXLER'S** Motion to Enlarge Time to Respond to Defendants' Rule 12(b)(6) Motion for Partial Dismissal of Plaintiff's Amended Complaint and any subsequent complaint pursuant to Rule 12 is GRANTED. Plaintiff, **GABRIELLE DREXLER**, is required to respond to Rule 12(b)(6) Motion for Partial Dismissal of Plaintiff's Amended Complaint until sixty (60) days after a final ruling has been made on the Peittion of Jeffrey R. Lessin & Associates, P.C. to Withdraw as Counsel for Plaintiff.

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The Hon. C. Darnell Jones

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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GABRIELLE DREXLER	:	
	:	
vs.	:	NO. 11-004467
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MOTION OF PLAINTIFF, GABRIELLE DREXLER, TO ENLARGE TIME  
TO RESPOND TO DEFENDANTS' RULE 12(B)(6) MOTION FOR  
PARTIAL DISMISSAL OF PLAINTIFF'S AMENDED COMPLAINT

Plaintiff, Gabrielle Drexler, through her present attorneys, Jeffrey R.Lessin & Associates, move this Court to enlarge the time for moving to respond to Defendants' Rule 12(b)(6) Motion for Partial Dismissal of Plaintiff's Amended Complaint and in support thereof aver the following:

1. This is a 42 U.S.C. §1983 action which was initiated by the filing of a Complaint on July 13, 2011
2. Defendants, Township of Lower Merion, Township of Lower Merion Police Department, Superintendent Michael J. McGrath, and Officer Stephen Salera, filed a timely partial motion to dismiss on August 9, 2011.
3. Plaintiff's counsel filed a petition seeking leave to withdraw as counsel (due to lack of cooperation) on August 10, 2011.
4. Plaintiff's counsel and counsel for movants Township of Lower Merion, Township of Lower Merion Police Department, Superintendent Michael J. McGrath, and Officer Stephen Salera have agreed that Plaintiff should have an extension to answer the pending partial motion to dismiss until after the Court has ruled on Plaintiff's counsel's petition seeking leave to withdraw as counsel.

5. Moving Plaintiff is requesting an extension of time in which to file a response to this partial motion to dismiss until a final ruling is made regarding Plaintiff's counsel's petition seeking leave to withdraw as counsel, so as to allow Plaintiff to obtain alternate counsel and determine a course of action.

6. Moving Plaintiff requests that an extension of time of sixty (60) days after a final ruling has been made on Plaintiff's counsel's petition seeking leave to withdraw as counsel.

7. Good cause exists to enlarge the time within which Plaintiff may respond to the partial motion to dismiss.

8. There is no opposition to this motion.

WHEREFORE, Plaintiff, Gabrielle Drexler, requests that the Court grant her motion to enlarge the time to respond to the pending partial motion to dismiss.

JEFFREY R. LESSIN & ASSOCIATES, P.C.

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CERTIFICATE OF SERVICE

I, Jeffrey R. Lessin, Esquire, certify that a true and correct copy of the  
aforementioned Motion of Plaintiff Defendants, Gabrielle Drexler's Motion to Enlarge  
Time to Respond to Plaintiffs Amended Complaint was served upon all counsel and  
individual parties via U. S. First Class Mail, postage prepaid, and through electronic service  
on this date as follows:

TOWNSHIP OF LOWER MERION

Township of Lower Merion Police Department, Superintendent Michael J. McGrath,  
Officer Stephen Salera, c/o  
Christopher Boyle, Sr., Esquire/ Joseph A. Santarone, Esquire  
Marshall, Dennehey, Warner, Coleman & Goggin  
620 Freedom Business Center, Suite 300  
King of Prussia, PA 19406

Michael John, c/o  
George H. Knoell, III, Esquire  
Kane, Pugh, Knoell, Troy & Kramer, LLP  
510 Swede Street  
Norristown, PA 19401

JEFFREY R. LESSIN & ASSOCIATES, P.C.

By: Jeffrey R. Lessin  
JEFFREY R. LESSIN  
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UNITED STATES DISTRICT COURT  
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	:	
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MEMORANDUM OF LAW IN SUPPORT OF MOTION OF PLAINTIFF, GABRIELLE DREXLER, TO ENLARGE TIME TO RESPOND TO DEFENDANTS' RULE 12(B)(6) MOTION FOR PARTIAL DISMISSAL OF PLAINTIFF'S AMENDED COMPLAINT

Plaintiff, Gabrielle Drexler, through her present attorneys, Jeffrey R.Lessin & Associates, submits this memorandum in support of her motion filed with this Court to enlarge the time for moving to respond to Defendants' Rule 12(b)(6) Motion for Partial Dismissal of Plaintiff's Amended Complaint and in support thereof aver the following:

I. Introduction

This is a 42 U.S.C. §1983 action which was initiated by the filing of a Complaint on July 13, 2011. Defendants, Township of Lower Merion, Township of Lower Merion Police Department, Superintendent Michael J. McGrath, and Officer Stephen Salera, filed a timely partial motion to dismiss on August 9, 2011.

Plaintiff's counsel filed a petition seeking leave to withdraw as counsel (due to lack of cooperation) on August 10, 2011.

II. Request for Relief

Plaintiff's counsel and counsel for movants Township of Lower Merion, Township of Lower Merion Police Department, Superintendent Michael J. McGrath, and Officer Stephen Salera have agreed that Plaintiff should have an extension to answer the pending partial motion to dismiss until after the Court has ruled on Plaintiff's counsel's petition

seeking leave to withdraw as counsel.

Moving Plaintiff is requesting an extension of time in which to file a response to this partial motion to dismiss until a final ruling is made regarding Plaintiff's counsel's petition seeking leave to withdraw as counsel, so as to allow Plaintiff to obtain alternate counsel and determine a course of action. Moving Plaintiff requests that an extension of time of sixty (60) days after a final ruling has been made on Plaintiff's counsel's petition seeking leave to withdraw as counsel.

Good cause exists to enlarge the time within which Plaintiff may respond to the partial motion to dismiss. There is no opposition to this motion.

III. Conclusion

WHEREFORE, Plaintiff, Gabrielle Drexler, requests that the Court grant her motion to enlarge the time to respond to the pending partial motion to dismiss.

Respectfully,

JEFFREY R. LESSIN & ASSOCIATES, P.C.

By: Jeffrey R. Lessin  
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